



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

June 20, 2011

Mr. Robert Guidi
Department of the Army
U.S. Army Garrison Presidio of Monterey
Directorate of Public Works, Master Plans
P.O. Box 5004
Presidio of Monterey, California 93944

Subject: Draft Environmental Impact Statement (DEIS) for the Real Property Master Plan at the Presidio of Monterey, California (CEQ # 20110121)

Dear Mr. Guidi:

The U.S. Environmental Protection Agency has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Our detailed comments are enclosed.

The Draft Environmental Impact Statement (DEIS) assesses the impacts from implementing the Presidio of Monterey (POM) Real Property Master Plan – the Army's vision for the installation for the next 20 years. The POM is home to the Defense Language Institute Foreign Language Center. Improvements are needed to modernize or replace aging classrooms and dormitories and to improve transportation circulation within the POM. The DEIS includes a project level analysis for 3 projects that are funded, and a programmatic-level analysis for 23 additional long-term projects. Alternative 1 – the POM-centric alternative, where the majority of the installation improvements would occur within the POM, is the preferred alternative.

Master planning efforts provide an excellent opportunity to incorporate sustainability, including comprehensive mitigation strategies, into long-term decision-making. The POM Real Property Master Plan alternatives do not take full advantage of this opportunity, however. The alternatives do not integrate transportation and energy decisions into the plans, and the preferred Alternative 1 offers a development plan for which there is currently insufficient water supply. Because of this, we have rated the DEIS's preferred Alternative 1 as Environmental Concerns – Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions").

The DEIS identifies Alternative 1 as the environmentally preferable alternative, despite the fact that Alternative 2 would have sufficient water supply, fewer impacts to visual resources, and the same level of impact to all other resources assessed (Table ES-1). The Army should provide an explanation as to why Alternative 1 is deemed environmentally preferable. We agree that concentrating activities at one location does offer the potential environmental benefits that come from creating a compact walkable and bicycle-friendly campus. However, to achieve this, the plan would need to include improvements to facilitate pedestrian and bicycle use. We recommend amending the plan to integrate components that would encourage alternative transportation modes. We also recommend incorporating energy efficiency and renewable energy components into the plans, and integrating low-impact development requirements

with proposed drainage improvement projects. Finally, we caution against proceeding with a planning vision that cannot be supported with current water supplies.

EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

Connell Running
Fol Kathleen Martyn Goforth, Manager
Environmental Review Office

Enclosure: Summary of EPA Rating Definitions
EPA's Detailed Comments

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Water Resources

Drinking Water Supply

There is insufficient water supply available for the Preferred Alternative 1. Alternative 1 consists of 3 short-term projects (Barracks phase I and IV, and renovation of Building 326) at the Presidio of Monterey (POM), and 23 long-term projects at the POM and 7 at the Ord Military Community (OMC) site. The 23 long-term projects received a programmatic level of analysis.

Groundwater is the drinking water source for both sites, utilizing the Carmel Valley and Salinas Valley groundwater basins respectively. These basins are overdrawn and subject to significant restrictions imposed by a State Water Resources Control Board order (for Carmel Valley basin), and a court adjudication (for Salinas Valley basin) for current and future water supplies. The DEIS indicates that there would be sufficient water available for the 3 short-term projects, but the limited water available at the POM would be insufficient to meet the build-out demands of the planned long-range facilities. The overall shortfall at the POM is estimated at 6.7 acre-feet/year (p. 4-2). The DEIS concludes that these impacts are significant and unavoidable. The DEIS describes potential future mitigation options, including the possibility of transferring or trading water rights, but these are described as possibilities for the future and are “not currently known mitigation measures” (p. 4-4).

We are concerned that the Army has designated an alternative with insufficient available water supply as the preferred alternative. While the DEIS indicates that these long-term projects will receive supplemental project-level environmental review once funding is assured, it is inappropriate to proceed with this master plan vision with such a significant development constraint.

Recommendation: EPA recommends that the Army not proceed with the Master Plan vision described in Alternative 1 unless sufficient water credits are available or there is a strategy for addressing water source issues. The FEIS should describe the likelihood of obtaining additional water credits for future development. We recommend amending the Master Plan to include additional water conservation measures, described below.

Water Conservation

The DEIS states that water saving devices, such as waterless urinals and low-flow toilets, rainwater collection systems, and landscaping with drought tolerant plants are required for new buildings under the 2004 POM and OMC Community Water Management Plan; however, it does not discuss the potential savings that could occur from retrofitting existing buildings with these features. The fiscal year (FY) 2011 general instruction building, evaluated in a 2008 Environmental Assessment, will include a rainfall collection system, sized to store enough water for use in the building's low-flow toilets throughout the year (Appendix A, p. 3). The FEIS should evaluate the water savings that could occur from adding these systems to existing buildings. The 14 buildings that will undergo water diversion upgrades as long-term projects would be good candidates for these retrofits.

The DEIS indicates that the OMC is not metered. Source metering is a fundamental tool of water system management and conservation and is essential for developing a water accounting system, which is necessary to develop strategies for loss control. OMC could be metered to provide additional information regarding

water use at this site and to inform water conservation efforts. Reliability of water supplies will continue to be affected by climate change. Projections of future precipitation generally indicate that areas in the western United States will become drier. Another climate change effect is the impairment of freshwater supplies from saltwater intrusion resulting from sea level rise. CEQ recently released the *Draft National Action Plan: Priorities for Managing Freshwater Resources in a Changing Climate*¹. This draft report emphasizes the importance of collecting data for understanding climate change impacts on water, including water use information with special data collection efforts designed to track changing water use patterns relevant to public water systems and other demands.

Recommendation: We recommend that the Master planning effort include an update to the 2004 Community Water Management Plan. Decisions on development actions should be based on availability of sufficient water supplies. Because water availability is so vital to planning efforts at the POM, the Master Plan should explore metering at the OMC and conduct water conservation retrofits of existing buildings in the POM, including rainwater harvesting on the 14 buildings for which water diversion upgrades are planned. Given the need to conserve water resources, it is not sufficient to state that the POM and OMC are “demand hardened” and that any additional water conservation measures are too expensive (Appendix A, p. 14). The Army must continue to develop water conservation strategies and continuously assess feasibility of additional measures. The FEIS should also discuss how the POM will meet the water use efficiency requirements of Executive Order 13514 - Federal Leadership in Environmental, Energy, and Economic Performance.

Low Impact Development

Low Impact Development (LID) requirements of the Energy Independence and Security Act of 2007 are identified in the DEIS, but the Master plan alternatives do not specify how these techniques will be utilized. Instead, it lists some LID Best Management Practices and states that they will occur “to the extent practical” (p. 4-8). LID techniques such as rain gardens and other bioretention features must be integrated into siting decisions and development plans. This is especially relevant, since one of the long-term projects would provide drainage improvement for 14 buildings, involving the redirection of downspout flows to new inlets and creating new drainage trenches (p. 2-18).

Recommendation: The Master Plan should provide a more detailed site plan for the alternatives, indicating which LID features are most practical for the sites, where these LID features will be located, and how they will be integrated into short-term and long-term projects, especially the water diversion upgrades. Quantitative LID goals should be adopted for the plan, where possible, such as specifying the percent of runoff retained onsite or specifying the amount of impervious surface at the installation.

Sustainability Features - Transportation

Transportation is key to planning; however, the DEIS does not discuss the current modes of circulation on the POM and how improvements to the transportation system could improve sustainability for the installation. The DEIS only discusses traffic impacts to intersections and roadways and seems to assume and accept that new residents will use cars as the primary mode of travel. The Master plan alternatives

¹ Available:

http://www.whitehouse.gov/sites/default/files/microsites/ceq/nadraft6_2_11_final.pdf?CFID=4790291&CFTOKEN=62899208

do not include components or provide strategies to facilitate alternative transportation modes, including transit and non-motorized transportation. The DEIS does reference the existence of an internal shuttle service (p. 3-74) but does not discuss adequacy nor include improvements to this service as part of the project. It states that pedestrian facilities are non-continuous, with sidewalks located solely on one side of a roadway (p. 3-76), but no pedestrian improvements are identified in the project description. The majority of the existing roadways do not have dedicated bicycle lanes nor do they allow enough room for vehicles and bicycles to comfortably share the roadway (p. 3-76), yet projects to improve bicycle circulation and safety are not referenced. The DEIS refers to a 2010 Comprehensive Transportation Study, and references 126 projects that it contains, but this study is not included in the DEIS nor integrated into the Master plan vision. Facilitating multi-modal networks on the POM could lead to a reduced need for parking structures and reduced impacts to resources as a result. Improving and providing for alternative transportation is also important for reducing greenhouse gas emissions (GHGs), which is required under Executive Order 13514 - Federal Leadership in Environmental, Energy, and Economic Performance. We note that the California Complete Streets Act of 2008 requires cities and counties in California to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, older people, and disabled people, as well as motorists. We encourage the Army to meet these stated objectives by committing to additional transportation planning measures in the FEIS.

Recommendations: Master planning efforts are the time to develop land use plans and transportation improvements, as well as other infrastructure plans, in a coordinated manner, with all elements supporting a common vision. We recommend that the alternatives be modified to include strategies to facilitate alternative transportation modes, including pedestrian travel and bicycles. The Army should integrate sidewalks, bicycle lanes/paths, sufficient shoulders to accommodate safe bicycle travel, and shared-use paths into the POM. Improvements to the shuttle service should be assessed and included if needed. The FEIS should discuss the need for the number of parking structures that are proposed and reduce the number of parking spaces if possible. The Army may want to explore the possibility of basing a commercial car sharing program at the POM to reduce parking needs.

Sustainability Features - Energy

Energy use is also vital to an integrated plan for sustainability. The project descriptions do not discuss energy efficiency measures or include renewable energy components. The DEIS does not evaluate energy conservation potential as required by the Council on Environmental Quality (CEQ) Regulations (40 CFR 1502.16(e)), nor discuss GHG emissions associated with energy use as recommended in the CEQ's Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions¹. We understand that the commitment to constructing new buildings as certified Silver under Leadership in Energy and Environmental Design (LEED), per Department of Defense requirements, could include such features, but specific renewable energy components should be prominent in a sustainable Master plan. The preferred alternative includes a number of facilities that could support photovoltaics.

Recommendations: Incorporate energy efficiency and renewable energy features into the project design and project description. Discuss the energy conservation potential of the project per 40 CFR 1502.16(e). The FEIS should incorporate alternative energy components, including solar hot water systems and photovoltaics on rooftops, on carports in parking lots and parking

¹http://ceq.hss.doe.gov/nepa/regs/Consideration_of_Effects_of_GHG_Draft_NEPA_Guidance_FINAL_02182010.pdf

structures, and other appropriate locations. Shading parking areas also reduces evaporative emissions of air pollutants from parked vehicles.

Greenhouse Gas Emissions and Climate Actions

Master planning efforts are also good opportunities to describe and set greenhouse gas emissions reductions goals and discuss actions that would reduce these emissions. The DEIS quantifies carbon dioxide (CO₂) emissions but no discussion of these values is included, nor are goals and strategies identified to reduce these new emissions or the existing emissions at the POM.

Recommendations: Discuss the greenhouse gas emissions estimates and their sources, and identify means to reduce these emissions. If the POM has a climate action plan, it could be referenced and summarized. Describe how the alternatives comport with the plan and with goals set by the State of California.

Air Quality Construction Emissions

The DEIS does not identify nor commit to reasonable mitigation measures to reduce construction-related emissions. The DEIS states that construction emissions from short-term projects are less than significant and do not need to be mitigated. Only dust control measures are identified as potential mitigation.

Additionally, impacts from air toxics are not discussed. Diesel exhaust is classified by EPA as a "likely" human carcinogen at environmental exposure levels. Since residences are located nearby the POM boundary, efforts should be made to reduce exposure to these sensitive receptors from construction equipment.

Recommendations: Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow. Identify sensitive receptors in the project area and specify the means to minimize impacts to these populations. For example, locate construction equipment and staging areas away from sensitive receptors and fresh air intakes to buildings and air conditioners.

In addition to fugitive dust control, EPA recommends the Army adopt the following reasonable mitigation measures.

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels and to perform at verified standards applicable to retrofit technologies.
- Limit idling for all vehicles. The California Air Resources Board has a number of mobile source anti-idling requirements that could be consulted, see <http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>.
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal¹ or State Standards². In general, commit to the best available emissions control technology.

¹ EPA's website for nonroad mobile sources is <http://www.epa.gov/nonroad/>.

² For ARB emissions standards, see: <http://www.arb.ca.gov/msprog/offroad/offroad.htm>.

Tier 4 engines should be used for project construction equipment to the maximum extent feasible¹;

- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site.

Biological Resources

The Barracks Phase I and IV projects occurring in the short-term would result in removal of up to 1,100 trees (p. 4-18). Monterey Pines are considered rare or endangered in California by the California Native Plant Society (CNPS) and their ecosystems are considered to be Environmentally Sensitive Habitat Areas by the California Coastal Commission (p. 3-21). The DEIS does not identify the number of Monterey Pines that would be removed, but Figure 3.4-2 identifies large areas of Monterey pine, including where Barracks I and IV are proposed. The DEIS states that this impact would be potentially significant but is reduced to less than significant with the mitigation measure to replace all native trees at a 2:1 ratio (p. 4-24). It is not clear if the POM has sufficient space to accommodate all the replacement trees.

The project will require removal of at least 16 Yadon's Piperia – a federally endangered plant species, in the short-term, and 45 additional plants for the long-term projects. The DEIS says that this species is protected through management efforts in the Endangered Species Management Plan, but does not indicate what these efforts are. It also says that this plan was recently updated, but it is unclear if it was updated to include this Master plan proposal.

We recommend against reducing the acreage of the nature preserve, which would be required for the Barracks Phase I project (p. 4-18) and the new Highway 68 access control point (ACP) (p. 4-20). The Highway 68 ACP will also have a number of other impacts to biological resources, including removal of 1.7 acres of Monterey pine and 1.6 acres of Hooker's Manzanita. The necessity of the new Highway 68 ACP is not clear.

Recommendation: The FEIS should estimate the number of replacement trees that would be required for the proposed mitigation and indicate whether there is sufficient space on the POM for this mitigation and where it would occur.

The FEIS should identify some of the management efforts that will occur to protect the Yadon's Piperia. The Endangered Species Management Plan should be updated to reflect the Master Plan's impacts.

The FEIS should attempt to modify the site plan to avoid removal of any acreage of nature preserve. The purpose and need for the new Highway 68 ACP should be identified, and if it is not imperative, it should be eliminated.

¹ Diesel engines < 25 hp rated power started phasing in Tier 4 Model Years in 2008. Larger Tier 4 diesel engines will be phased in depending on the rated power (e.g., 25 hp - <75 hp: 2013; 75 hp - < 175 hp: 2012-2013; 175 hp - < 750 hp: 2011 - 2013; and \geq 750 hp 2011- 2015).